

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

EUGENE JONES

PLAINTIFF

v.

CASE NO. 4:21-cv-00287-LPR-ERE

DOC HOLLADAY, SHERIFF, *et al.*

DEFENDANTS

**NOTICE OF INSUFFICIENCY OF SERVICE
ON DEFENDANT DR. KAREN CHASE**

To: The clerk of court:

1. On April 12, 2021, *pro se* Plaintiff Eugene Jones refiled his Complaint in this action naming “Dr. Karen Chase” as a defendant. (ECF Doc. 2, *Compl.*).

2. On August 9, 2021, an Order was issued by the Court directing the Clerk to prepare a Summons for the named Defendants and the U.S. Marshal to serve Defendants Kimberly Harrison and Dr. Karen Chase care of the undersigned counsel at Turn Key Health Clinics, LLC. (ECF Doc. 49).

3. On September 13, 2021, Turn Key’s corporate office was served with the Complaint and Summons for both Kimberly Harrison and Dr. Karen Chase.

4. Neither Dr. Chase nor Ms. Harrison were current employees of Turn Key Health Clinics, LLC at the time of service.

5. Therefore, the undersigned counsel made attempts to contact both Defendant Chase and Defendant Harrison to confirm whether they consented to Ms. Ah Loy accepting service on their behalf.

6. Counsel has been unable to make contact with Dr. Karen Chase, whose employment with Turn Key Health Clinics, LLC ended on September 1, 2017.

7. The undersigned does not have authority to accept service of process for Defendant Dr. Karen Chase and has no way to notify her of the same. Therefore, Dr. Chase is unaware of the Summons and Complaint.

8. For proper service of the Complaint and Summons for Dr. Chase, these pleadings should be directed to her last known address: 4 Lacy Lane, Sherwood, Arkansas 72120.

Respectfully submitted,

Alexandra G. Ah Loy
Arkansas Bar No. 2020020
Turn Key Health Clinics, LLC
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Oklahoma City, OK 73106
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E-Mail: allie@turnkeyhealthclinics.com
Attorney for Defendant Kimberly Harrison

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that on the 4th day of October, 2021, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the ECF parties of record, and by mailing a First Class Post-Prepaid copy of the same to the following parties of record:

Eugene Jones
ADC #169865
CUMMINS UNIT
Arkansas Division of Correction
Post Office Box 500
Grady, AR 71644-0500
Pro Se Plaintiff



Alexandra G. Ah Loy